

**REMARKS/ARGUMENTS**

Claims 1-33 are pending in the present application. The Examiner has rejected claims 1-33. Applicant has amended claim 1. Applicant respectfully requests reconsideration of pending claims 1-33.

The Examiner has rejected claims 1-16, 23, 24, 32, and 33 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Regarding claims 1-16, Applicant has amended claim 1 to clarify that no antecedent basis need be shown for "an input connection identifier." Applicant submits that the amendment is merely cosmetic, in that the meaning of the claim could be readily ascertained prior to the amendment, and the amendment is merely formal in nature. Thus, Applicant submits that the Examiner's rejection of claims 1-16 is obviated.

Regarding claim 3, Applicant respectfully disagrees. Applicant notes that the specification is replete with description of how cells can be included in a packet. As one example, page 3, lines 26-28, state, "If the connection identifier for a cell indicates that the cell is IP traffic, the cell is stored with other cells included in the IP packet to which the cells correspond within the ingress line card of the switch." As another example, page 8, line 15 states, "The packet 210 is divided into a plurality of cells 211-213....Thus, even though IP traffic is packet based, the data is divided into a number of cells for transmission through portions of the network, including the multi-protocol switch 100." As yet another example, page 9, lines 21-23, state, "Thus, as the packet 210 is received, the cells 211-213 included in the packet 210 are stored within the memory or queue corresponding to that packet such that the packet is reassembled." Thus, Applicant submits that claim 3 can be readily understood in view of the disclosure provided in the specification. Therefore, Applicant submits that the rejection of claim 3 is obviated.

Regarding claims 23 and 24, Applicant respectfully disagrees. Applicant notes that the process of selecting causes the selected virtual connection to become selected. Thus, among a plurality of virtual connections, "a selected virtual connection" becomes so selected according to the recited step of "selecting...." Accordingly, a selected virtual connection need not be "further" selected, as stated by the Examiner. Consequently, Applicant submits the confusion alleged by the Examiner does not exist with respect to claim 23 and the rejection of claims 23 and 24 is obviated.

Regarding claims 32 and 33, the Examiner states that "it is unclear what is being selected and how the selection is determined. Applicant respectfully disagrees. Claim 32 states, in part, "...the ingress line card selects the selected transport interface...." Thus, since "the selected transport interface" is the object of the verb "selects," it is clear that "the selected transport interface" is being selected. Furthermore, the aforementioned portion of claim 32 is followed by two adverbial prepositional phrases joined by the conjunction "and," wherein each of the prepositional phrases comprises a gerund phrase. Therefore, since adverbial prepositional phrases modify how the action of a verb is performed, and, in this case, the verb being so modified is "selects," logically it cannot be said that "it is unclear...how the selection is determined." Rather, it is clear from claim 32 that "the ingress line card selects the selected transport interface" in accordance with the two adverbial prepositional phrases. Accordingly, Applicant submits that the rejection of claims 32 and 33 is obviated.

The Examiner has rejected claims 1, 2, 6, 7, 17, 22, 23, and 25 under 35 U.S.C. § 102(e) as being anticipated by Puntambekar et al. (U.S. Patent No. 6,097,726). Applicant respectfully disagrees. In fact, Applicant notes that Puntambekar et al. appear to teach away from the present invention. For example, in col. 5, lines 49-51, Puntambekar et al. state, "Egress means the Cell card that sends data cells upstream on the trunk, and "ingress" means the Cell card that receives data cells sent by an egress Cell card." Thus, for example, with regard to claim 1, Puntambekar et al. appear to teach away from "...wherein the ingress line card forwards at least a portion of the cell over the switching fabric to at least one of the plurality of egress line cards based on the forwarding decision." As another example, with regard to claim 17, Puntambekar et al. appear to teach away from "receiving a cell over an ingress connection, wherein the cell includes an ingress connection identifier" and "...routing the cell through the multi-protocol switch based on the ingress connection identifier."

Furthermore, rather than teaching "a plurality of egress line cards..." and "an ingress line card..." "...wherein the ingress line card forwards at least a portion of the cell over the switching fabric to at least one of the plurality of egress line cards based on the forwarding decision," Puntambekar et al. states in col. 3, lines 9-11, "...multipoint-to-point (MPT) traffic destined for a switch is merged to a single virtual path...."

Thus, Applicant submits that Puntambekar et al. fail to anticipate the present invention, as recited in claims 1, 2, 6, 7, 17, 22, 23, and 25. Therefore, Applicant submits that claims 1, 2, 6, 7, 17, 22, 23, and 25 are in condition for allowance.

The Examiner has rejected claims 3-5 under 35 U.S.C. § 103(a) as being unpatentable over Puntambekar et al. in view of Honda et al. (U.S. Patent No. 6,147,999). Applicant respectfully disagrees. As noted above, Applicant submits that Puntambekar et al. teach away from the present invention as set forth in claim 1, from which claims 3-5 depend. Thus, Applicant submits that Puntambekar et al. further teach away from any attempt to combine the teachings of Puntambekar et al. and Honda et al. Furthermore, the Examiner states that Puntambekar et al. do not disclose that the ingress line card segments the reassembled packet to produce segmented cells. Therefore, Applicant submits that neither Puntambekar et al. nor Honda et al., either alone or in any attempted combination, teach or suggest the present invention, as set forth in claims 3-5. Consequently, Applicant submits that claims 3-5 are in condition for allowance.

The Examiner has rejected claims 8-12, 18, 19, 24, 26, and 31-33 under 35 U.S.C. § 103(a) as being unpatentable over Puntambekar et al. in view of Zheng et al. (U.S. Patent No. 6,611,522). Applicant respectfully disagrees. As noted above, Applicant submits that Puntambekar et al. teach away from the present invention as set forth in claim 1, from which claims 8-12 depend, and claim 17, from which claims 18, 19, 24, and 26 depend. Thus, Applicant submits that Puntambekar et al. further teach away from any attempt to combine the teachings of Puntambekar et al. and Zheng et al.

Furthermore, regarding claims 8, 12, 24, and 26, the Examiner states that Puntambekar et al. do not disclose that each of the virtual connections is characterized by a plurality of connection parameters, wherein the plurality of connection parameters for a selected virtual connection characterize a class of service provided across the virtual connection or that the transport interfaces are grouped according to the class of service. Also, regarding claims 9 and 33, the Examiner states that Puntambekar et al. do not disclose that the ingress line card includes, supports and transports packet-over-SONET (POS) frames. Further, regarding claims 10, 11, and 18, the Examiner states that Puntambekar et al. do not disclose that the first protocol is asynchronous transfer mode (ATM) and the second protocol is Internet Protocol (IP).

While claim 31 is an independent claim that Applicant has not yet discussed above, Applicant notes that the Examiner states, "Referring to claims 31 and 32, the claim limitations correspond to similar limitations as that of claim 1 and therefore these limitations are rejected for the same reasons as claim 1." Also, regarding claims 31 and 32, the Examiner states that Puntambekar et al. do not disclose that the transport interface or the TIG is grouped according to a class of service. Thus, to whatever extent the Examiner asserts that claims 31 and 32 are rejected for the same reasons as claim

1, Applicant submits that Puntambekar et al. teaches away, as discussed above in regard to claim 1. Therefore, Applicant submits that neither Puntambekar et al. nor Zheng et al., either alone or in any attempted combination, teach or suggest the present invention, as set forth in claims 8-12, 18, 19, 24, 26, and 31-33. Consequently, Applicant submits that claims 8-12, 18, 19, 24, 26, and 31-33 are in condition for allowance.

The Examiner has rejected claims 13-16 and 27 under 35 U.S.C. § 103(a) as being unpatentable over Puntambekar et al. in view of Smith et al. (U.S. Patent No. 6,128,649). Applicant respectfully disagrees. As noted above, Applicant submits that Puntambekar et al. teach away from the present invention as set forth in claim 1, from which claims 13-16 depend, and claim 17, from which claim 27 depends. Thus, Applicant submits that Puntambekar et al. further teach away from any attempt to combine the teachings of Puntambekar et al. and Smith et al. Furthermore, Applicant notes that the Examiner states that Puntambekar et al. do not disclose that the switch operates using a multicasting protocol. Therefore, Applicant submits that neither Puntambekar et al. nor Smith et al., either alone or in any attempted combination, teach or suggest the present invention, as set forth in claims 13-16 and 27. Consequently, Applicant submits that claims 13-16 and 27 are in condition for allowance.

The Examiner has rejected claims 20, 28, and 29 under 35 U.S.C. § 103(a) as being unpatentable over Puntambekar et al. in view of Honda et al. and further in view of Zheng et al. Applicant respectfully disagrees. As noted above, Applicant submits that Puntambekar et al. teach away from the present invention as set forth in claim 17, from which claim 20 depends. Thus, Applicant submits that Puntambekar et al. further teach away from any attempt to combine the teachings of Puntambekar et al., Honda et al., and Zheng et al. Furthermore, Applicant notes that the Examiner states that Puntambekar et al. do not disclose segmenting the reassembled packet to produce segmentation cells and forwarding segmentation cells. Therefore, Applicant submits that none of Puntambekar et al., Honda et al., or Zheng et al., either alone or in any attempted combination, teach or suggest the present invention, as set forth in claim 20. Regarding claims 28 and 29, in reference to the alleged teachings of Puntambekar et al, the Examiner states, "...the ingress line card forwards the cell across the switching fabric to at least one egress line card of the egress line cards based on the ingress connection identifier for the cell." As Applicant notes with regard to the rejection of claims 1, 2, 6, 7, 17, 22, 23, and 25 under 35 U.S.C. § 102(e) above, Puntambekar et al. appears to teach away from such alleged teaching. Furthermore, the Examiner states that Puntambekar et al. do not disclose that the ingress line card segments the reassembled packet to produce segmented cells. Therefore,

Applicant submits that none of Puntambekar et al., Honda et al., or Zheng et al., either alone or in any attempted combination, teach or suggest the present invention, as set forth in claim claims 28 or 29. Consequently, Applicant submits that claims 20, 28, and 29 are in condition for allowance.

The Examiner has rejected claims 21 and 30 under 35 U.S.C. § 103(a) as being unpatentable over Puntambekar et al. in view of Honda et al. and Zheng et al. and further in view of Yang et al. (U.S. Patent No. 5,917,819). Applicant respectfully disagrees. As noted above, Applicant submits that Puntambekar et al. teach away from the present invention as set forth in claim 17, from which claim 21 depends, and claim 28, from which claim 30 depends. Thus, Applicant submits that Puntambekar et al. further teach away from any attempt to combine the teachings of Puntambekar et al., Zheng et al., and Yang et al. Furthermore, Applicant notes that the Examiner states that Puntambekar et al. do not disclose determining an egress index for the reassembled packet based on the destination address and using the egress index to forward at least a portion of the reassembled packet to at least one egress connection. Therefore, Applicant submits that none of Puntambekar et al., Zheng et al., or Yang et al., either alone or in any attempted combination, teach or suggest the present invention, as set forth in claims 21 and 30. Consequently, Applicant submits that claims 21 and 30 are in condition for allowance.

In conclusion, Applicant has overcome all of the Office's rejections, and early notice of allowance to this effect is earnestly solicited. If, for any reason, the Office is unable to allow the Application on the next Office Action, and believes a telephone interview would be helpful, the Examiner is respectfully requested to contact the undersigned attorney.

Respectfully submitted,

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Date



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